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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**  
10

11 N.Z., R.M., B.L., S.M., and A.L.,  
12 individually and on behalf of  
themselves and all others similarly  
13 situated,

14 Plaintiffs,

15 vs.

16 FENIX INTERNATIONAL LIMITED,  
FENIX INTERNET LLC, BOSS  
BADDIES LLC, MOXY  
17 MANAGEMENT, UNRULY  
AGENCY LLC (also d/b/a DYSRPT  
18 AGENCY), BEHAVE AGENCY LLC,  
A.S.H. AGENCY, CONTENT X, INC.,  
19 VERGE AGENCY, INC., AND ELITE  
CREATORS LLC,  
20

21 Defendants.  
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CASE NO. 8:24-cv-01655-FWS-SSC

**JOINT STIPULATION TO  
SYNCHRONIZE DEFENDANTS'  
DEADLINES TO RESPOND TO  
COMPLAINT**

Filed Concurrently with [Proposed]  
Order

Assigned to Hon. Fred W. Slaughter

1 Plaintiffs N.Z., R.M., B.L., S.M., and A.L. (together, “Plaintiffs”), and  
2 Defendants Moxy Management, Verge Agency, Inc., Elite Creators LLC, and Content  
3 X, Inc. (together, “Stipulating Defendants” and, with Plaintiffs, the “Parties”), by and  
4 through their respective counsel of record, hereby stipulate to synchronize the  
5 deadline for Stipulating Defendants to respond to Plaintiffs’ Class Action Complaint  
6 (the “Complaint”) and agree as follows:

7 WHEREAS, Plaintiffs filed the Complaint in the above-captioned matter on  
8 July 29, 2024 (ECF No. 1);

9 WHEREAS, the Stipulating Defendants were served, and currently have  
10 response dates, as follows:

11 (a) Moxy Management executed and returned a Waiver of Service of  
12 Summons to Plaintiffs on August 5, 2024, thereby setting its response deadline as  
13 October 4, 2024 (ECF No. 18);

14 (b) Verge Agency, Inc. was served on August 7, 2024, and, pursuant to  
15 stipulation, its response deadline is September 27, 2024 (ECF Nos. 27, 35);

16 (c) Elite Creators LLC was served on August 5, 2024, and, pursuant to  
17 stipulation, its response deadline is October 4, 2024 (ECF Nos. 19, 33-34); and

18 (d) Context X, Inc. was served on August 2, 2024 (ECF No. 26), and,  
19 pursuant to an agreement between the parties, its deadline to respond to the  
20 Complaint is October 3, 2024;

21 WHEREAS, pursuant to stipulation as ordered by the Court on August 22,  
22 2024, the deadline for Defendants Fenix Internet LLC and Fenix International  
23 Limited (together, the “Fenix Defendants”) to respond to the Complaint is October  
24 25, 2024 (ECF Nos. 29 & 32);

25 WHEREAS, the Court’s and the Parties’ resources, as well as the interests of  
26 justice, will be best served by having a single coordinated date for the Stipulating  
27 Defendants and Fenix Defendants to respond to the Complaint;

28 WHEREAS, the Parties agree that the deadline for all Stipulating Defendants

1 to respond to the Complaint should be October 25, 2024, the same as the date for the  
2 Fenix Defendants;

3 WHEREAS, the requested synchronized date will not impact any other  
4 deadlines in the action;

5 THEREFORE, IT IS HEREBY STIPULATED AND AGREED that the  
6 deadline for Stipulating Defendants to answer, move, or otherwise respond to the  
7 Complaint shall be October 25, 2024.

8 IT IS SO STIPULATED.  
9  
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11 DATED: September 25, 2024 Respectfully submitted,

12 Oliver Rocos  
13 Barr Benjamin  
14 Bird, Marella, Rhow,  
15 Lincenberg, Drooks & Nessim, LLP  
16

17 By: /s/ Oliver Rocos  
18 Oliver Rocos  
19 Attorneys for Defendant Moxy Management  
20

21 DATED: September 25, 2024 Teresa C. Chow  
22 Dyanne J. Cho  
23 Paul Karlsgodt  
24 Baker & Hostetler LLP  
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26 By: /s/ Paul Karlsgodt  
27 Paul Karlsgodt  
28 Attorneys for Verge Agency, Inc.

1 DATED: September 25, 2024

Bety Javidzad  
Michael A. Gehret  
Trinity S. Jordan  
Jordan E. Westgate  
Dentons US LLP

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6 By: /s/ Michael A. Gehret  
Michael A. Gehret  
7 Attorneys for Elite Creators LLC  
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10 DATED: September 25, 2024

Nithin Kumar  
Kingfisher Law APC

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12  
13 By: /s/ Nithin Kumar  
Nithin Kumar  
14 Attorneys for Context X, Inc.  
15

16 DATED: September 25, 2024

Christopher R. Pitoun  
Robert B. Carey  
Michella A. Kras  
Hagens Berman Sobol Shapiro LLP

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20 By: /s/ Michella A. Kras  
Michella A. Kras  
21 Attorneys for Plaintiffs N.Z., R.M., B.L.,  
22 S.M., and A.L.  
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## ATTESTATION

Pursuant to CIV. L.R. 5-4.3.4(a)(2)(i), the filer attests that all signatories listed, and on whose behalf this filing is submitted, concur in its content and have authorized the filing.

DATED: September 25, 2024      Oliver Rocos  
Bird, Marella, Rhow,  
Lincenberg, Drooks & Nessim, LLP

By: /s/ Oliver Rocos  
 Oliver Rocos  
 Attorneys for Defendant Moxy  
 Management